Eli's Hospice Insider

Hospice Item Set: Prepare For 30-Day HIS Deadline Next year

Submitting Hospice Item Set data within a month no longer just a guideline.

If you can't submit 90 percent of your HIS records within 30 days, you'll take a reimbursement hit under a new CMS proposal.

In its 2016 proposed payment rule for hospices, the **Centers for Medicare & Medicaid Services** maps out a three-year plan to ramp up HIS submission compliance.

"Beginning with the FY 2018 payment determination and subsequent FY payment determinations, we propose that all HIS records must be submitted within 30 days of the Event Date, which is the patient's admission date or discharge date," CMS says in the rule published in the May 5 Federal Register. CMS proposes that hospices must submit:

- no less than 70 percent of their total number of HIS-Admission and HIS-Discharge records in calendar year 2016 by no later than 30 days from the Event Date for the FY 2018 APU determination;

- 80 percent of CY 2017 HIS records for FY 2019; and

- 90 percent of CY 2018 HIS records for FY 2020 and subsequent years.

How it's calculated: "The threshold corresponds with the overall amount of HIS records received from each provider that fall within the established 30 day submission timeframes," CMS explains. "Our ultimate goal is to require all hospices to achieve a timeliness requirement compliance rate of 90 percent or more."

Take note: Home health agencies got CMS to back off a similar timeline for OASIS submissions after rule commenters kicked up a fuss about the unrealistic 90 percent benchmark. In the final rule for HH PPS 2015, CMS agreed to require the 70 percent in the first year, but hold off on the 80 percent and 90 percent time points.

"We plan to monitor provider performance" under the 70 percent requirement, CMS explained in the rule. "We will then use such information, as available, to make a determination about what the 'pay-for-reporting' performance requirement will be set at in the 2nd and subsequent years."